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May 16, 2016



Felicia Marcus, Chair
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

VIA EMAIL: commentletters@waterboards.ca.gov

Chair Marcus,

Olivenhain Municipal Water District is a public agency in northern San Diego County that provides 84,000 customers with water, wastewater, recycled water, hydroelectric, and recreational services.

Thank you for the opportunity to submit these comments on the State Water Resources Control Board (SWRCB) staff proposal for extended emergency regulations for urban water conservation. OMWD's board and executive staff appreciate the time you have given to us the past 18 months as we have all worked together to develop reasonable, effective regulations that incentivize water conservation and reflect local supply conditions. We appreciate and thank the SWRCB for allowing the self-certification process for the recognition of local, sustainable supplies.

We would ask that the SWRCB consider allowing for locally developed water supply since 2013 and 2014, specifically recycled water, in the establishment of the baseline for conservation calculations. Since 2013, OMWD has converted several hundred acre feet of potable demands to recycled water, and another several hundred acre feet are under construction to be converted to recycled water this next year. This is potable water demand that existed in 2013, but is now no longer potable water demand. By using the average of 2013 and 2014 as a baseline for demand, it does not reflect the actual demands that were converted to recycled water since 2013.

The governor's Executive Order also calls for the development of Agricultural Water Management Plans. We are very proud in the San Diego region to have recently completed a multi-agency Regional Agricultural Water Management Plan (RAWMP), which was submitted to Department of Water Resource and expect that this recently completed RAWMP satisfies the new requirement in the governor's Executive Order.



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Thank you for consideration of these comments. We appreciate the hard work and efforts by the SWRCB and your staff. If you or your staff should need any additional information regarding our assessment of the proposed framework responsive to the governor's Executive Order, please contact the undersigned at 760-753-6466.

Sincerely,



Kimberly A. Thorner

General Manager

cc: Olivenhain Municipal Water District Board of Directors